

partially

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**UNITED STATES DISTRICT COURT**

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**SOUTHERN DISTRICT OF TEXAS**

## **BROWNSVILLE DIVISION**

**United States District Court  
Southern District of Texas  
FILED**

**UNITED STATES OF AMERICA**

AUG 26 2014

VS

**David J. Bradley, Clerk of Court**

JOSE DEJESUS RUIZ

**FABIAN MEDINA**

CRIMINAL NO. B-14-653

## INDICTMENT

## THE GRAND JURY CHARGES:

**COUNT ONE**

From on or about December, 2009, and continuing thereafter until on or about October, 2010, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,

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**FABIAN MEDINA.**

did knowingly and willfully conspire and agree together and with other persons known and unknown to the Grand Jurors to Violate Title 18, United States Code, Section

924(a)(1)(A), that is, the object of their conspiracy and agreement was to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code.

#### **MANNER AND MEANS OF THE CONSPIRACY**

1. It was part of the conspiracy that, the defendant, JOSE DEJESUS RUIZ enlisted, directed, and recruited individuals which included, the defendants [REDACTED] [REDACTED] FABIAN MEDINA, [REDACTED] to purchase firearms for and or to recruit others to purchase firearms for the, defendant, JOSE DEJESUS RUIZ.

2. It was further part of the conspiracy that, the defendant, JOSE DEJESUS RUIZ, would provide the money for the purchase of the firearms and instruct the co-conspirators as to which firearms to buy. The co-conspirators would be paid a fee for each firearm they purchased.

3. Finally, it was also part of the conspiracy that the purchasers of the firearms, which included the defendants, [REDACTED] [REDACTED], FABIAN MEDINA and [REDACTED] would acquire and attempt to acquire firearms from licensed dealers by knowingly making false and fictitious statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code.

#### **OVERT ACTS:**

1. On or about December 18, 2009, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED] for the purchase of a firearm and also instructed him as to which firearm to purchase.
2. On or about December 18, 2009, the defendant, [REDACTED] purchased one Taurus, .380 caliber handgun, serial number KCP55720, from Academy, by knowingly making a false statement and representation.
3. On or about December 18, 2009, the defendant, [REDACTED] was paid a fee of two hundred and fifty dollars by JOSE DEJESUS RUIZ for the purchase of the Taurus firearm.
4. On or about December 28, 2009, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED], for the purchase of a firearm and also instructed him as to which firearm to purchase.
5. On or about December 28, 2009, the defendant, [REDACTED] purchased one Glock, 10mm caliber handgun, serial number MUT727, from Academy, by knowingly making a false statement and representation.
6. On or about December 28, 2009, the defendant, [REDACTED] was paid a fee of two hundred and fifty dollars by JOSE DEJESUS RUIZ for the purchase of the Glock firearm.
7. On or about June 8, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED], for the purchase of a firearm and also instructed him as to which firearm to purchase.

8. On or about June 8, 2010, the defendant, [REDACTED], purchased one Bushmaster, .223 caliber semi-automatic rifle, serial number L532111, from Lone Star Guns, by knowingly making a false statement and representation.

9. On or about June 8, 2010, the defendant, [REDACTED] was paid a fee of two hundred and fifty dollars by JOSE DEJESUS RUIZ for the purchase of the Bushmaster firearm.

10. On or about March 16, 2010, the defendant, [REDACTED] recruited the defendant [REDACTED], to purchase firearms.

11. On or about March 16, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED], for the purchase of a firearm and also instructed him as to which firearm to purchase.

12. On or about March 16, 2010, the defendant, [REDACTED], drove [REDACTED] [REDACTED] to Chucks Gun Shop for the purpose of purchasing a firearm for JOSE DEJESUS RUIZ.

13. On or about March 16, 2010, the defendant, [REDACTED] purchased one Beretta, .9mm caliber handgun, serial number J09935Z, from Chucks Gun Shop, by knowingly making a false statement and representation.

14. On or about March 16, 2010, the defendant [REDACTED] was paid a fee of one hundred dollars for the purchase of the Beretta firearm.

15. On or about March 20, 2010, the defendant, [REDACTED] drove [REDACTED] [REDACTED] and JOSE DEJESUS RUIZ to Lone Star Guns for the purpose of purchasing firearms.

16. On or about March 20, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED], for the purchase of firearms and also instructed him as to which firearms to purchase.

17. On or about March 20, 2010, the defendant, [REDACTED] purchased two Beretta, .9mm caliber handguns, serial numbers J26863Z and J26805Z, from Lone Star Guns, by knowingly making a false statement and representation.

18. On or about March 20, 2010, the defendant [REDACTED] was paid a fee of one hundred dollars for the purchase of each Beretta firearm.

19. On or about April 7, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED] for the purchase of a firearm and also instructed him as to which firearm to purchase.

20. On or about April 7, 2010, the defendant, [REDACTED], purchased one Beretta, 9mm caliber handgun, serial number M55609Z, Johnny's True Value Hardware, by knowingly making a false statement and representation.

21. On or about April 20, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED] for the purchase of firearms and also instructed him as to which firearms to purchase.

22. On or about April 20, 2010, the defendant, [REDACTED] purchased two CIA, 7.62 x 39 caliber semi-automatic rifle, serial numbers 1980KR0668 and 1973EI4613, at Johnny's True Value Hardware, by knowingly making a false statement and representation.

23. On or about May 29, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to FABIAN MEDINA, for the purchase of a firearm and also instructed him as to which firearm to purchase.

24. On or about May 29, 2010, the defendant, FABIAN MEDINA, purchased one Olympic Arms, .223 caliber semi-automatic rifle, serial number JF7770, at Lone Star Guns, by knowingly making a false statement and representation.

25. On or about May 29, 2010, FABIAN MEDINA was paid a fee for the firearm he purchased.

26. On or about May 29, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to [REDACTED] for the purchase of a firearm and also instructed him as to which firearm to purchase.

27. On or about May 29, 2010, the defendant, [REDACTED] purchased one Century Arms, 7.62 x 39 caliber semi-automatic rifle, serial number 1966TU2152, at Lone Star Guns, by knowingly making a false statement and representation.

28. On or about May 29, 2010, [REDACTED] was paid a fee for the firearm he purchased.

29. On or about June 17, 2010, the defendant, [REDACTED] recruited JMV to purchase a firearm for JOSE DEJESUS RUIZ.

30. On or about June 17, 2010, the defendant, [REDACTED] drove JMV to meet with JOSE DEJESUS RUIZ. JOSE DEJESUS RUIZ and others then drove JMV to Danny's Pawn and Sporting Goods so that she could purchase a firearm.

31. On or about June 17, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to JMV, for the purchase of a firearm and also instructed her as to which firearm to purchase.

32. On or about June 17, 2010, JMV, purchased one Stag, .223 caliber semi-automatic rifle, serial number 124336, at Danny's Pawn and Sporting Goods, by knowingly making a false statement and representation.

33. On or about September 28, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to FABIAN MEDINA, for the purchase of a firearm and also instructed him as to which firearm to purchase.

34. On or about September 28, 2010, the defendant, FABIAN MEDINA, purchased two Bushmaster, .223 caliber semi-automatic rifles, serial numbers L529911 and L52771, at Lone Star Guns, by knowingly making a false statement and representation.

35. On or about September 28, 2010, the defendant FABIAN MEDINA was paid a fee by JOSE DEJESUS RUIZ for the firearms he purchased.

36. On or about October 1, 2010, the defendant, JOSE DEJESUS RUIZ, provided money to FABIAN MEDINA, for the purchase of a firearm and also instructed him as to which firearm to purchase.

37. On or about October 1, 2010, the defendant, FABIAN MEDINA, whom had been recruited by [REDACTED] to purchase weapons for others, purchased two Bushmaster, 5.56 caliber semi-automatic rifles, serial numbers BFI648609 and L525460, at The Armory, by knowingly making a false statement and representation.

38. On or about October 1, 2010, the defendant FABIAN MEDINA was paid a fee by JOSE DEJESUS RUIZ for the firearms he purchased.

In violation of Title 18, United States Code, Sections 371, 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWO

On or about December 18, 2009, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and

[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED] did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Taurus, 380 caliber handgun, serial number KCP55720, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT THREE

On or about December 28, 2009, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED], did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Glock 10mm caliber semi-automatic handgun, serial number MUT727, whereas in truth and in fact, he was acquiring the firearm on behalf of another person.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about June 8, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED] did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473,

Firearms Transaction Record, to the effect that he was the actual buyer of one Bushmaster .223 caliber semiautomatic rifle, serial number, L532111, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about March 16, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  


knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Chucks Gun Shop, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant,  did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Beretta 9mm caliber semiautomatic handgun, serial number, J09935Z, whereas in truth and in fact, he was acquiring the firearms on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT SIX

On or about March 20, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED] did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two Beretta 9mm caliber semiautomatic handguns, serial numbers, J26863Z and J26805Z, whereas in truth and in fact, he was acquiring the firearms on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about April 17, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records

of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED] did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Beretta 9mm caliber semiautomatic handgun, serial number, M55609Z, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about April 20, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED], did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two CIA 7.62 x 39 caliber semiautomatic rifles, serial numbers, 1980KR0668 and 1973EI4613, whereas in truth and in fact, he was acquiring the firearms on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT NINE

On or about May 29, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and  
FABIAN MEDINA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, FABIAN MEDINA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Olympic Arms .223 caliber semiautomatic rifle, serial number, JF7770, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TEN

On or about May 29, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
and  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, [REDACTED] did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Century Arms 7.62 x 39 caliber semiautomatic rifle, serial number, 1966TU2152, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about June 17, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ  
and  
[REDACTED]

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants caused, JMV, to execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473,

Firearms Transaction Record, to the effect that she was the actual buyer of one Stag .223 caliber semiautomatic rifle, serial number, 124336, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about September 28, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
[REDACTED]

and

FABIAN MEDINA

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, FABIAN MEDINA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two Bushmaster .223 caliber semiautomatic rifles, serial numbers, L529911 and L52771, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about October 1, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

JOSE DEJESUS RUIZ,  
[REDACTED]

and  
FABIAN MEDINA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the record of Danny's Pawn & Sporting Goods, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, FABIAN MEDINA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two Bushmaster 5.56 caliber semiautomatic rifles, serial numbers, BFI648609 and L525460, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

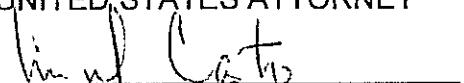
In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

  
ANGEL CASTRO  
Assistant United States Attorney